

# Exhibit A

**SHOOK**  
HARDY & BACON

**Shook, Hardy & Bacon L.L.P.**  
2555 Grand Boulevard  
Kansas City, MO 64108-2613  
(816) 474-6550

**JOHN LEWIS JR.**  
RECEIVER  
600 TRAVIS ST., SUITE 3400  
HOUSTON, TX 77002-2926

**Invoice No:** **3021399**  
**Invoice Date:** 08/09/2023  
**Matter Number:** 33206.393697  
**Billing Attorney:** John Lewis Jr.

**Summary of Invoice**  
For Professional services and disbursements thru **July 31, 2023**

SEC vs. Mauricio Chaves, et al. - John Lewis, Jr. Receiver; Receivers Invoice

Current Fees	\$37,695.00
<b>Total Amount Due</b>	<b>\$37,695.00</b>

## **REMITTANCE INFORMATION**

**Please verify your records reflect our new Wiring Instructions and Remit Address.**

**Wiring Instructions**  
Commerce Bank  
1000 Walnut  
Kansas City, MO 64106  
ABA Number: 101000019  
SWIFT: CBKCUS44  
Account Number: 43056

**Remit Address**  
Shook, Hardy & Bacon L.L.P.  
PO Box 843718  
Kansas City, MO 64184-3718

**Federal Tax ID:**  
44-0585497



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## Invoice Detail

For Professional services and disbursements thru *July 31, 2023*

SEC vs. Mauricio Chaves, et al. - John Lewis, Jr. Receiver; Receivers Invoice

### Professional Services

Date	Attorney	Description	Hours	Amount
<b>SEC01 Asset Analysis</b>				
04/03/23	JLJ	Strategize with team on BSA issues, pending real estate closings, expansion of receivership, privilege issues related to inbound subpoena response and demand for fees.	1.80	\$945.00
05/24/23	JLJ	Skim Mezomo and Munoz interview summary. Analysis of range of next steps with cooperating witnesses.	0.90	472.50
06/02/23	JLJ	Exchanges regarding counter offer from Waller County tract. Attention to transfer documents following broker sale of Mercedes.	0.80	420.00
06/20/23	JLJ	Consideration of counter offer on Mack Washington property and contingencies thereto.	0.70	367.50
<b>Subtotal for SEC01</b>		Asset Analysis	4.20	\$2,205.00
<b>SEC04 Case Admin</b>				
05/01/23	JLJ	Strategize and provide guidance to team on various pending matters.	0.80	\$420.00
05/03/23	JLJ	Skim cooperating witness interview notes and key documents provided (1.8); Review and follow up questions on Waller County land sale (1.0)	2.80	1,470.00
05/10/23	JLJ	Skim documents produced by Reyes. Careful review of fee application and supporting drafts. Approval of same	0.80	420.00
05/22/23	JLJ	Review of workstream with team including ongoing efforts to access Google Docs for leader profits information, preparation for call with SEC staff and assets sales of Waller property and vehicles. Turns of emails regarding same.	2.60	1,365.00
06/05/23	JLJ	Strategize team on various workstreams including targeted net winners analysis, money order/BSA claims, rescoping options for Blockchain work.	1.50	787.50
06/06/23	JLJ	Detailed review of case administration and outstanding matters with ST and collaboration on 90 day work plan.	2.20	1,155.00
06/08/23	JLJ	NO CHARGE - Review of status of various workstream in preparation for ST hand off and P. Poston onboarding. Skim prior filings and materials.	5.00	No Charge
06/09/23	JLJ	Call with S. Themeli and P. Pritchett regarding	1.20	630.00



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litigation strategy.					
06/12/23	JLJ	Review 90 day action plan with team regarding expansion, turnover issues, ongoing fraud efforts, expenses and Blocktrace scope of work.	1.50	787.50	
06/13/23	JLJ	Call with M. Gulde regarding crypto, staffing and case administration.	1.20	630.00	
06/14/23	JLJ	Detailed review of draft Blocktrace report. Edits to same.	6.00	3,150.00	
06/15/23	JLJ	Prepare for and participate in briefing with M. Gulde and J. Harris on cryptocurrency efforts and presentation from J. Daniels from Blocktrace. Action items following briefing.	2.10	1,102.50	
06/16/23	JLJ	Attention to checks deposit from sale of Mercedes	0.80	420.00	
06/20/23	JLJ	Analysis of open issues and workstreams with team including evaluating potential relief defendants, ongoing review of draft Blocktrace report, discussion of potential interview NJ leaders. Attention to tracking and status of outstanding subpoenas and demand letters.	1.50	787.50	
06/21/23	JLJ	Detailed review of open workstreams following S.Themeli departure.	4.00	2,100.00	
06/22/23	JLJ	Deep dive into preliminary Blocktrace preliminary report and recommendation on identification, accessing and valuing over 6800 crypto accounts transactions to develop a cost effective strategy for marshalling and liquidating.	3.00	1,575.00	
06/26/23	JLJ	Detailed review of Blocktrace fee application draft.	1.50	787.50	
06/26/23	JLJ	Detailed strategy update on ongoing work including Taffinder demand, tracking and updates on 20 + outstanding subpoenas and demand letters to leaders, family members and potential relief defendants, consideration of scope of Blocktrace work, analysis of moneygram cases and theories of liability and damages.	3.20	1,680.00	
06/27/23	JLJ	Additional edits to draft interim report.	1.50	787.50	
<b>Subtotal for SEC04</b>		Case Admin	43.20	\$20,055.00	

**SEC05 Claims Admin**

05/12/23	JLJ	Skim and approve Benvenuto analysis for forward to SEC.	0.80	\$420.00	
05/15/23	JLJ	Strategize with team on open issues including sale negotiations regarding Waller property, Blocktrace ongoing work and billing and brief on document production and billing issues.	1.80	945.00	
05/16/23	JLJ	Skim Montoya documents and interaction with Benvenuto Holdings in relation as part of analysis of basis for seeking expansion of receivership relief defendants.	1.10	577.50	
<b>Subtotal for SEC05</b>		Claims Admin	3.70	\$1,942.50	



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**SEC08 Business Analysis**

05/31/23	JLJ	Continue to digest the Blockchain draft report. Debrief from call with J. Harris on information exchanges. Direct team on next steps.	1.50	\$787.50
06/13/23	JLJ	Review and comments to draft interim report on crypto research and recovery efforts.	2.50	1,312.50
<b>Subtotal for SEC08</b>		<b>Business Analysis</b>	<b>4.00</b>	<b>\$2,100.00</b>

**SEC11 Status Reports**

04/17/23	JLJ	Strategizing team regarding content, secondary source reports and evidence gathered for upcoming court mandated status report.	1.80	\$945.00
06/28/23	JLJ	Skim past interim reports for inputs into current draft. Review cash flows and form 2's for banking activity.	2.20	1,155.00
06/29/23	JLJ	Continued revisions to upcoming interim report including preliminary findings by Block trace and description of proposed work going forward.	1.30	682.50
06/30/23	JLJ	Continued attention to drafting of interim report and consideration of proposed Block trace workplan.	1.10	577.50
<b>Subtotal for SEC11</b>		<b>Status Reports</b>	<b>6.40</b>	<b>\$3,360.00</b>

**SEC12 Litigation Consulting**

04/04/23	JLJ	Lengthy call with B. Abernathy and J. Posma regarding potential regulatory and audit matters.	1.30	\$682.50
<b>Subtotal for SEC12</b>		<b>Litigation Consulting</b>	<b>1.30</b>	<b>\$682.50</b>

**SEC13 Litigation**

04/05/23	JLJ	Inputs to Motion to Compel draft. Follow questions on Blocktrace report requested compensation.	1.80	\$945.00
04/10/23	JLJ	Skim notes from Torres interview (.8); attention to Wildlife Management contract for Waller county tract (.7)	1.50	787.50
04/18/23	JLJ	Skim, offer edits to Motion to Compel draft	1.50	787.50
05/15/23	JLJ	Attention to turns of response to motion to compel, authorize new lis pendens actions based on newly discovered operations, exchanges with interested parties.	1.70	892.50
05/17/23	JLJ	Review and comments to Reply brief to Motion to Compel Chavez.	0.80	420.00
05/23/23	JLJ	Turns of Reply to Motion to Compel Chavez. Skim Blockchain work and draft summary of report status.	2.50	1,312.50
06/12/23	JLJ	Detailed status of turnover demands (Vargas and Gonzales), procedural aspects of prospective fraudulent transfer claims, consideration of pending motion to compel on expanding receivership. Skim interview notes from 15+ interviews.	2.50	1,312.50
06/23/23	JLJ	Detailed review of research (factual and legal) on	1.70	892.50



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PLS potential cause of action.

<b>Subtotal for SEC13</b>	Litigation	14.00	\$7,350.00
Total		76.80	\$37,695.00

**Timekeeper Summary**

Initials	Name	Hours	Rate	Amount
JLJ	John Lewis Jr.	71.80	\$525.00	\$37,695.00
<b>Total Fees</b>		<b>71.80</b>		<b>\$37,695.00</b>
<b>Total Amount Due</b>				<b>\$37,695.00</b>